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March 15, 2024

VIA ECF

Hon. P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007
Courtroom 11D

Re: *FCS Advisors, LLC, v. Theia Group, Inc., et al.,*
Case No. 21 Civ. 6995 (PKC)

Dear Judge Castel:

We write on behalf of Basler Turbo Conversions, L.L.C. ("Basler"), a creditor of defendant Theia Group, Inc. and the movant in the motion filed in the above-referenced action at ECF No. 428. Having only appeared in the matter today, and unable to determine from the docket, we do not know the date of the next conference before the Court. We write to request a modification of the briefing schedule mandated by Local Rule 6.1(b).

Specifically, Basler moved today for an order compelling payment of the cure amounts required by the Court's October 26, 2023 Order, or in the alternative, granting relief from the Court's October 26, 2023 Order and the receivership stay.¹ In the Notice of Motion, we were constrained to set the briefing schedule pursuant to Local Rule 6.1(b). Therefore, the opposition papers are due March 29, 2024 and reply papers are due April 5, 2024. However, due to counsel's travel schedule and other conflicts, a modified briefing schedule is needed. Therefore, we respectfully request that the Court adjust the briefing schedule to provide for any opposition on April 5 and Basler's reply on April 12.]

Thank you for your attention to this matter.

APPLIED
GRANTED
S/O ORDERED
JW March 11, 2024
3-19-24

¹ We understand pursuant to Your Honor's individual rule 3A(i)(j) that a pre-motion letter was unnecessary for a motion brought pursuant to Fed. R. Civ. P. 60. Accordingly, we did not file one.



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Respectfully submitted,

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cc: All counsel of record